

REMARKS/ARGUMENTS

Claims 1-24 are pending. Claims 1-24 were amended. No claims have been canceled, added or withdrawn. Withdrawal of the outstanding rejections to the pending claims is respectfully requested in view of the following remarks.

35 USC §101 Rejections

Claims 1-24 stand rejected under 35 USC §101 as being directed to non-statutory subject matter because: (a) “a computer readable medium” is not limited to a tangible medium; (b) the claims do not require any physical transformation; and (c) the invention does not produce a useful, concrete and tangible result. Applicant has amended **independent claims 1, 12 and 20** to clearly illustrate that the claims are directed to statutory subject matter within the meaning of 35 USC §101.

For example, the preamble of claims 1 and 12 have been amended to recite “[a] tangible computer-readable data storage medium”. (Specification, Fig. 2, system memory 204). Additionally, the preamble of claim 20 has been amended to recite “a computing device”. Tangible computer-readable data storage media and computing devices are statutory subject matter within the meaning of 35 USC §101.

Additionally, amended independent **claim 1** recites “**communicating**, by the peer, the data stream using the translated connection parameters **to provide peer-to-peer communications.**” (emphasis added). Independent **claim 12** recites “**maintaining**, by a local peer, **a peer-to-peer connection between the local peer and one or more remote peers**, by ...” (emphasis added). Moreover, independent **claim 20** recites “the computerized system being configured to use

information in the local connection translation table **to translate data stream connection specifications and ensure that data packets get routed to appropriate addresses and ports in peer-to-peer communications**” (emphasis added). Applicant respectfully submits that providing peer-to-peer communications (claim 1), maintaining peer-to-peer communications (claim 12), and ensuring that data packets get delivered in peer-to-peer communications (claim 20) each has sufficient real-world value, human purpose and tangible results for products and processes within the meaning of utility under 35 USC §101.

Dependent **claims 2-11, 13-19 and 21-24** depend from respective ones of independent claims 1, 12 and 20. For the above reasons, these dependent claims are also directed to statutory subject matter within the meaning of 35 USC §101.

Withdrawal of the 35 USC §101 rejections to claims 1-24 is requested.

35 USC §112, Second Paragraph, Rejections

Claim 12 stands rejected under 35 USC §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. Claim 12 has been amended to more particularly point out and distinctly claim the term "its" in line 3. Withdrawal of the 35 USC §112 rejection of claim 12 is requested.

35 USC §102 Rejections

Claims 1-24 stand rejected under 35 USC §102(e) as being anticipated by US patent application publication no. 2002/0188657. ("Traversat"). However, the Manual of Patent Examining Procedure (M.P.E.P.) states that a claim is

anticipated by a reference **only** if each and every element as set forth in the claim can be found in the reference and, furthermore, that the **identical** invention **must** be shown in as complete detail as is contained in the claim.

A claim is anticipated **only** if each and every element set forth in the claim is found, either expressly or inherently described, in a single prior art reference. ... The **identical** invention **must** be shown in as complete detail as is contained in the ... claim.

(M.P.E.P. § 2131, subsection titled “TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM”, emphasis added). Each of the independent **claims 1, 12 and 20** include at least one feature not described by *Traversat*. For at least this reason, the rejections under 35 U.S.C. § 102 of the independent claims 1, 12 and 20, and corresponding dependent claims 2-11, 13-19 and 21-24, should be withdrawn. Examples of claim features not found in *Traversat* are given below.

Independent **claim 1** as amended recites in part:

- maintaining, local to a peer participating in one or more communication connections, a local connection translation table, the local connection translation table, for each connection of the one or more communication connections, comprising:
 - original connection parameters for the connection, the original connection parameters specifying an initial network attachment point associated with original establishment of the connection between the peer and a remote peer;
 - current connection parameters for the connection, the current connection parameters being different from the original connection parameters if the

- connection no longer uses the initial attachment point for incoming and outgoing data streams; and
- responsive to a data stream at an active connection of the one or more communication connections, generating, by the peer, translated connection specifications from connection specifications of the data stream using the original connection parameters and the current connection parameters mapped to the active connection; and
 - communicating, by the peer, the data stream using the translated connection parameters to provide peer-to-peer communications.

The specification describes these features, for example, in paragraphs [0045] through [0055].

Claim 1 has been amended to more clearly point out that original and current connection parameters in a local connection translation table are used by a peer participating in peer-to-peer communications to translate connection specifications of data streams at active communication connections. When a communication connection no longer uses an initial network attachment point for incoming/outgoing data streams, the corresponding original and current connection parameters are not the same. This is because the original parameters specify the initial network attachment point associated with the original establishment of the connection between the peer and a remote peer. Moreover, the current parameters indicate the new network attachment point. The peer uses the translated connection specifications to communicate the data streams in peer to peer communications. *Traversat* does not describe such features. Instead *Traversat* describes providing "a universal unique identifier (UUID), for example,

a 64-or 128-bit datum, to refer to an entity or resource (e.g., a peer, peer group, service, application, pipe, advertisement, in point, content, etc.). (Please see paragraphs [0027], [0116], [0249], [0393], [0399], [0414]). Examples of such UUIDs are described at paragraph [0028], including "a proprietary alphanumeric naming scheme", a "URN", etc.

Although *Traversat* indicates that such UUIDs can be *bound* to other information such as a network address (e.g., paragraphs [0029] and [0116]), nowhere does *Traversat* describe or fairly suggest that such a UUID or associated bound information is "a local connection translation table" that identifies "an initial network attachment point associated with original establishment of the connection between the peer and a remote peer" and "current connection parameters being different from the original connection parameters if the connection no longer uses the initial attachment point for incoming and outgoing data streams", as claim 1 requires. In this regard, *Traversat* clearly describes at paragraph [0031] "if the peer changes network addresses (e.g. is moved to a new network location), the peer identifier ma [sic] be unbound from the network address and bound to the new address" (emphasis added). Thus, *Traversat* does not appear to utilize initial connection information to maintain peer-to-peer communications once new connection information becomes available.

In view of the above, *Traversat* does not describe using "original connection parameters" and "current connection parameters" from the "local connection translation table" to generate "translated connection specifications" to communicate data streams in peer-to-peer communications. Thus, *Traversat* cannot describe each and every feature of claim 1. Independent claim 1 is patentable at least for these reasons. Additionally, **independent claims 12 and 20**

each include salient features similar to those of independent claim 1, and are therefore patentable for the same or similar reasons. Dependent **claims 2-11, 13-19, and 21-24** depend from respective ones of amended independent claims 1, 12 and 20, and are therefore patentable at least for reasons based on their respective dependencies.

Withdrawal of the 35 USC §102(a) rejection of claims 1-24 is respectfully requested.

Conclusion

Pending claims 1-24 are in condition for allowance and action to that end is respectfully requested. Should any issue remain that prevents allowance of the application, the Office is encouraged to contact the undersigned to discuss this case prior to issuing any subsequent Action.

Respectfully Submitted,

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By: / Brian G. Hart Reg. No. 44,421 /
Brian G. Hart
Reg. No. 44,421
(303) 526-1070